

REMARKS

Applicants appreciate the Examiner's review of the present Application, and request reconsideration in view of the preceding amendment and following remarks. Claims 1-20 as amended are pending in the present Application.

The Examiner has rejected Claims 1-20 under 35 U.S.C. §103 as being unpatentable over Farros by itself. Applicants traverse this rejection.

Regarding Claim 1, the Examiner states that Farros teaches the ability to produce a graphic description file and an image processing component to process a graphic description file and produce a graphic image. Applicants disagree.

The present invention includes the ability to produce a graphic description file which is used both for a batch printing process and also to be displayed to the user. Claim 1 recites "a graphic layout component, to process that information and produce a graphic description file, said graphic description file to be used in a batch printing process; and

an image producing component, to process said graphic description file and produce a graphic image." Claim 1, lines 5-8, as amended.

The present invention as claimed in Claim 1 includes the ability to use this **one** graphic description file, both for the batch printing process and also for displaying the final product to the user.

Farros does not teach this. Farros uses an FDF (format definition file) which contains information regarding how the printed product can be filled in by the user. See Farros Column 4, Lines 39-48. The system disclosed by Farros starts off with an encapsulated postscript file (EPS), which is made **before** any users interact with the system. The EPS file is a "template" of how a generic printed product will look, completely separate from any user-added personalization data. The EPS file is not modified by the user when the user is laying out the printed article. In fact, the EPS file is only used directly by the printing process at the end. Instead, Farros uses a CXX file which contains the information for the form design and all personalized data for each printed product. See Farros Column 5, Lines 15-23.

To display the printed article as the user is entering data, Farros uses the FDF file which contains the use of specific data and is modified as the user changes layout and other information. See Farros Column 9, Lines 60-67, and also Figure 11. In other words, Farros does **not** use the same graphic description file to display the printed article as will be used in the batch printing process.

An example of a problem this can cause is that font size increases or decreases (for example magnification or demagnification) are often approximated in the displayed article, and when it comes time to print the article, if the printing font differs in size from the displayed font (even minutely), then the text positioning and line breaks can be affected. A pre-press operator may have to manually reset the line positions and breaks, which takes extra time, and may also result in a final printed article which looks very different from what was displayed.

The present invention uses one graphic description file which is created based on the user information and is both displayed to the user and used in the printing process. One advantage of this is described in the specification in that the appearance and layout of the displayed article is **exactly** as the final printed product will appear. The font, font size and positioning will appear exactly as they will in the final printed article; and no adjustments are necessary before the batch printing process. Further, this technique allows non-Arabic lettering (e.g., Greek or Hebrew) to appear in the image exactly as it will be printed, instead of having to be displayed using filler characters in order to be displayed by system which does not have the non-Arabic character set or font. The present invention also works for right-to-left lettering, such as Hebrew.

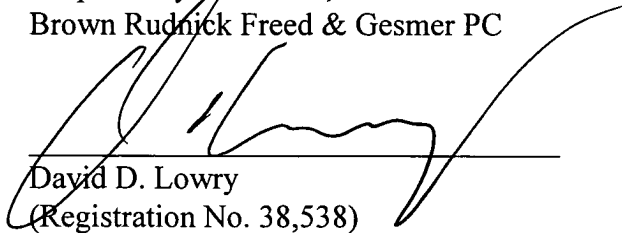
Further, Applicants assert that Farros provides no teachings of the advantages of using fewer files for storing data for batch printing; or the advantages of using the same graphic description file for both displaying and printing; and therefore Farros provides no suggestion or motivation to use one graphic description file. Applicants assert these same arguments apply to independent Claims 14 and 18, as amended.

Applicants have modified Claims 1, 14 and 18 to more clearly recite this novel feature of the present invention. Accordingly, Applicants assert that Claims 1, 14 and 18 and all claims dependent upon them are allowable over Farros.

Accordingly, Applicants urge that all claims in the present Application are in condition for allowance. Early and favorable action is respectfully requested.

The Examiner is invited to telephone the undersigned, Applicants' Attorney, to facilitate advancement of the present Application.

Respectfully submitted,
Brown Rudnick Freed & Gesmer PC

A handwritten signature in black ink, appearing to read 'David D. Lowry', is written over a horizontal line.

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